

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

**ROBERT CYRUS,**

**Plaintiff,**

**vs.**

**HYUNDAI MOTOR MANUFACTURING  
ALABAMA, LLC,**

**Defendant.**

**CIVIL ACTION NO.:**

**2:07-cv-00144-ID-TFM**

**REPORT OF THE PARTIES' PLANNING MEETING**

1. Pursuant to Fed. R. Civ. P. 26(f), a meeting of the parties' representatives was held on April 12, 2007, between counsel for the Plaintiff and counsel for the Defendant.

Appearing on behalf of Plaintiff:

Richard J. Stockham, III  
STOCKHAM & STOCKHAM  
2204 Lakeshore Drive  
Homewood, Alabama 35209

Appearing on behalf of Defendant:

Brian R. Bostick  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
One Federal Place, Suite 1000  
1819 5th Avenue North  
Birmingham, Alabama 35203

2. Pre-Discovery Disclosures:

The parties should exchange the information required by Local Rule 26.1(a)(1) on May 15, 2007.

3. Discovery Plan:

The parties jointly propose to the Court the following discovery plan:

a. Discovery will be needed on Plaintiff's claims and alleged damages, and Defendant's asserted defenses.

b. The parties stipulate that with respect to any electronically stored documents that are identified or requested during the course of discovery, such documents, to the extent reasonably accessible or otherwise not objectionable, will be produced either as a hard copy on paper, or stored on a CD or DVD formatted as a .PDF (portable document format) file.

c. All discovery must be commenced in time to be completed by January 15, 2008.

Depositions:

Maximum of 7 depositions for each party with a maximum time limit of 8 hours per deposition (except for plaintiff's deposition, which is limited to 10 hours), unless extended by agreement of the parties.

Interrogatories:

Maximum of 25 by each party, with responses due within 30 days after service.

Request for Admissions:

Maximum of 25 by each party, with responses due within 30 days after service.

Request for Production:

Maximum of 25 by each party, with responses due within 30 days after service.

Expert Testimony:

Unless modified by stipulation of the parties, the disclosure of expert witnesses - including a complete report under Fed. R. Civ. P. 26(a)(2)(B) from any specially retained or employed expert - are due:

From the Plaintiff on or before September 1, 2007.

From the Defendant on or before December 1, 2007.

Supplementation:

Supplementations under Rule 26(e), Fed. R. Civ. P., within a reasonable period of time after discovery of such information.

4. Other Items:

- a. The parties do not request a scheduling conference prior to the entry of the Scheduling Order.
- b. The parties request a pre-trial conference at some point after all dispositive motions have been ruled upon.
- c. The Plaintiff shall have until June 15, 2007, to amend the pleadings or add parties. The Defendants shall have until July 15, 2007, to amend the pleadings or add parties.
- d. All potentially dispositive motions must be filed by November 15, 2007.
- e. Settlement cannot be evaluated prior to conducting some initial discovery.
- f. Final lists of trial witnesses and exhibits under Fed. R. Civ. P. 26(a)(3) must be served and filed by the Plaintiff on or before 45 days before trial, and by the Defendant on or before 30 days before trial. Objections are to be filed and served within 15 days after receipt of final lists.
- g. The parties request that this case be scheduled for trial on the docket set for June 23, 2008. Trial is expected to last approximately 5 days.

Respectfully submitted this 12th day April, 2007.

ATTORNEY FOR PLAINTIFF:

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ONE OF THE ATTORNEYS FOR  
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